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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 TZU Technologies, LLC

Case No. 2:17-cv-01952-MMD-GWF

14 Plaintiff,

15 **STIPULATION AND**
PROPOSED ORDER TO
EXTEND TIME TO RESPOND
TO COMPLAINT
(Second Stipulation)

16 v.

17 [LR IA 6-1(a)]

LELO Inc.

18 Defendant.

19 Pursuant to Local Civil Rule 6-1(a), Plaintiff TZU Technologies, LLC (“Plaintiff”) and
20 Defendant Lelo Inc. (“Defendant”) (jointly “the Parties”), by and through their respective
21 counsel, hereby stipulate as follows:
22

1 WHEREAS, Plaintiff filed its Complaint against Defendant on July 18, 2017 (ECF No.

2 1);

3 WHEREAS Defendant was served with the summons and complaint on September 22,
4 2017;

5 WHEREAS Defendant was required to serve its respective answer and/or response to the
6 Complaint by October 13, 2017;

7 WHEREAS Plaintiff and Defendant jointly stipulated to a first extension of time to
8 answer and/or respond to the Complaint and the Court granted the stipulated request extending
9 the time for Defendant's answer and/or response to the Complaint to November 13, 2017 (first
10 extension)(ECF No. 13);

11 WHEREAS Plaintiff and Defendant have been engaged in informal settlement
12 discussions in an attempt to resolve their dispute and wish to continue such discussions;

13 WHEREAS Plaintiff and Defendant have again agreed to extend the date for Defendant
14 to answer and/or respond to the Complaint by an additional thirty (30) days, up to and including
15 December 13, 2017; and

16 WHEREAS this is Defendant' second request for extension of time to respond to the
17 Complaint in this action;

18 WHEREAS the stipulation is made in good faith to allow the parties to continue to
19 discuss a settlement agreement; and

20 WHEREAS the stipulation is not an attempt to delay proceedings.

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
22 through their respective counsel, that Defendant Lelo Inc. shall have an extension, up to and
23 including December 13, 2017, to answer and/or respond to Plaintiff's Complaint in this action.

1 Respectfully submitted,

2

3 Dated: November 9, 2017

4 **COTMAN IP LAW GROUP, PLC**

5 By: /s/ Jayson S. Sohi

6 Jayson S. Sohi

Attorneys for Plaintiff

TZU Technologies, LLC

Dated: November 9, 2017

DICKINSON WRIGHT PLLC

/s/ Steven A. Caloiaro

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13 Attorneys for Defendant LELO Inc.

14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: November 13, 2017


17 GEORGE FOLEY, JR.
18 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Dickinson Wright, PLLC, and
that on this date a true and correct copy of the foregoing **STIPULATION AND PROPOSED**
ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT will be served upon
counsel of record via the Court's ECF System electronic mail.

6 DATED: November 9, 2017 /s/ Cindy Grinstead
An Employee of Dickinson Wright, PLLC